

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.  
: :  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (SCC)  
: :  
Debtors. : (Jointly Administered)  
: :  
: :  
-----X  
LEHMAN COMMERCIAL PAPER INC. :  
: :  
Plaintiff, :  
: :  
: :  
-against- :  
: :  
BLUEBAY HIGH YIELD BOND FUND, *et al.*, : Adv. Case No.  
: 10-03831 (SCC)  
Defendant. :  
: :  
: :  
-----X

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND TO COMPLAINT**

The Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc. (the “Committee”), on the one hand, and BlueBay High Yield Bond Fund, *et al.* (the “Defendants”), on the other hand, respectfully submit this Stipulation and Order Extending Time to Respond to Complaint, and in support thereof, state as follows:

WHEREAS, on October 5, 2010, Lehman Brothers Commercial Paper Inc. (“LCPI”) commenced the above-captioned adversary proceeding (the “Adversary Proceeding”) by filing a complaint (the “Complaint”) against the Defendants.

WHEREAS, on October 7, 2010, the Clerk of the Court issued the Summons and Notice of Pretrial Conference In An Adversary Proceeding (the “Summons”) setting a response date for the Defendants to serve a responsive pleading or an answer to the Complaint under Fed. R. Bankr. P. 7012 within 30 days from the date of the Summons.

WHEREAS, pursuant to the *Order Granting Leave, Standing and Authority to the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., et al., to Prosecute and, if Appropriate, Settle Causes of Action on Behalf of Lehman Commercial Paper Inc.*, dated September 15, 2011 [Case No. 08-13555; ECF No. 20019], the Committee, represented by Milbank, Tweed, Hadley & McCloy LLP, was granted authorization to prosecute and, if appropriate, settle the above-referenced adversary proceeding on behalf of LCPI.

WHEREAS, pursuant to a series of orders, dated October 20, 2010, June 16, 2011, January 11, 2012, July 18, 2012, January 17, 2013, and February 15, 2013 [Case No. 08-13555; ECF Nos. 12199, 17763, 24198, 29506, 33970, 34697], the Court stayed the Adversary Proceeding until July 20, 2013.

WHEREAS, pursuant to the *Stipulation and Order Extending Time to Respond to Complaint*, dated March 26, 2014 [ECF No. 30], the Defendants were required to answer or otherwise respond to the Complaint by April 30, 2014.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by the Defendants and the Committee that the Defendants shall have a fifteen (15) day extension – until May 15, 2014 – to answer or otherwise respond to the Complaint. For the avoidance of doubt, nothing contained herein shall prejudice the right of the Committee and the Defendant to request further extensions of the deadline to respond to the Complaint. When so-ordered by the Court, this stipulation shall constitute both an agreement between the parties and an order of the Court.

Dated: April 28, 2014  
New York, New York

/s/ N. Theodore Zink  
N. Theodore Zink  
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/s/ David S. Cohen  
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Counsel for the Official Committee of  
Unsecured Creditors of Lehman Brothers  
Holdings Inc., *et al.*

**IT IS SO-ORDERED:**

April 30, 2014  
New York, New York

*/s/ Shelley C. Chapman*  
HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE